

## **Narrative Proposal for Cleanup Grant**

### **1. COMMUNITY NEED**

#### **1.a Target Community and Brownfields**

*Community and Target Area Description:* The Town of Montague is located in Franklin County, Massachusetts, the most rural county in the Commonwealth. The population was 8,437 as of the 2010 census. Montague is the second largest community in Franklin County and a principal employment center for the county. Founded in 1754 Montague is a town comprised of several small mill villages.

The Target Community, known as a village of Turners Falls is defined by Census Tract 407.01. Turners Falls is the largest village and thus this target area has the highest population and employment density in the Town. Turners Falls was a planned mill town on the Connecticut River- the largest river in New England. An industrial dam and canal was built in the 1860s and mills rapidly followed. Pulp and paper was the predominant industry, but cutlery and cotton were also produced in the village. Today the target community is the historic downtown, which enjoys with a healthy mix of multi-family, commercial and residential uses. Following industrial decline in the 80's and 90's, the town focused industrial development relocated to a industrial park 2 miles away, leaving the 6 riverfront mills of the "Canal District" vastly underutilized and in a state of blight.

MassDEP identifies approximately forty-nine (49) releases in Montague that are designated as brownfield sites according. Thirty-eight (38) of those are located in the Target Area of Turners Falls. By far the most concentrated population of Brownfields is the Canal District, to which the Strathmore Mill (Site) is prominently situated in. This is most likely the highest concentration of brownfields in Franklin County.

#### *Demographic Information and Indicators of Need:*

The Town of Montague and the Targeted community have a significant concentration of people living in poverty. One out of every four people in the Targeted Community are living in poverty. Over half of youth live below the poverty level. The poverty rates in the Target Community are significantly higher than the Town, County, State and National averages. The median household income of the Target Community is \$28,766 less than the state average and \$14,402 less than the national average. Additionally, The Town of Montague chronically experiences a higher rate of unemployment than the state and national average. The Targeted Community has been designated by the Massachusetts Economic Assistance Coordinating Council as an Economically Distressed Area.

<b>Table 1: Demographic Information for Montague, Massachusetts</b>					
	<b>Targeted Community</b>	<b>Town of Montague</b>	<b>Franklin County</b>	<b>Massachusetts</b>	<b>National</b>
	<b>Census Tract 407.01</b>				
<b>Population*</b>	4,395	8,394	71,300	6,657,291	314,107,084
<b>Unemployment**</b>	n/a	3.7%	2.8%	3.3%	5.0%
<b>Poverty Rate*</b>	25.9%	17.6%	11.9%	11.6%	15.6%
<b>Percent Minority*</b>	12.8%	10.3%	8.2%	25.0%	37.2%
<b>Median Household Income*</b>	\$39,080	\$47,236	\$54,072	\$67,846	\$53,482
<b>Percent population under 18 years of age who are determined to live below the poverty level*</b>	55.1%	36.4%	15.7%	15.1%	21.9%
* data are from the 2014 ACS 5 yr estimates					
** data are from the Bureau of Labor Statistics					

***Brownfields and Their Impacts:*** The brownfield property to be cleaned up under this grant (the Site) is a vacant riverfront paper mill building known locally as the “Strathmore Mill Building 11” (Parcel B). Parcel B is a standalone building on 0.4 acres separated from the 9 contiguous buildings that make up the Strathmore Mill Complex (Parcel A). Building 11 dates back to 1906 and was among the last of the original buildings of the former Keith Paper Mill.

The site is sandwiched on a narrow strip of land between a former, vacant coal generation power plant and an operating paper mill.

The Town of Montague acquired the mill in 2010 through property tax foreclosure and it has become the primary redevelopment priority for the community given its riverfront access and proximity to the steadily revitalizing downtown Turners Falls.

The Site was initially listed with the DEP for the presence of arsenic and polyaromatic hydrocarbons (PAHs). A Phase I and Phase II (2004) which included soil and ground water testing did not indicate remediation was required at the site. Regulatory Closure was achieved with a Class B-1 RAO. A 2005 Hazardous materials survey indicated the presence of asbestos and hazardous building materials in the buildings at the mill complex such as TSI piping, flashing cement, transite boards, floor tiles, caulking, and glazing. In 2007, prior to municipal ownership, Building #10 burned down and collapsed from an arson. This resulted in the formation of a large ACM co-mingled debris pile 20 feet from the Connecticut River and adjacent to the project Site. Since the collapse of building 10, it is now a stand-alone building

approximately 105 feet long by 48 feet wide. Constructed on a steep grade, the building is four stories on the south (canal) side and seven stories on the north (river side).

The Site has been vacant and in a state of decay since 2002 and has been contributing to blight in Turners Falls since then. In 2015, the Town and Ma Dept of Housing, Economic, and Community Development Designated the Historic-Industrial District a “Slum and Blight Designation Area” in effort to target resources to address the issue.

Although the Town has repeatedly attempted to maintain the building’s inaccessibility while the site is prepared for development, it is inevitable that youth and vagrants enter the site.

### **1.b Welfare, Environmental, and Public Health Impacts**

Welfare Impacts: The Massachusetts Executive Office of Energy and Environmental Affairs recognizes the Turners Falls Target Area (Census Tract 407.01) as an Environmental Justice Neighborhood because the annual median household income is equal or less than 65% of the statewide median income. The highest concentration of brownfields in Franklin County is located within this EJ Neighborhood.

The Turners Falls Canal District in particular is in a state of disrepair and has a recognizable pattern of disinvestment. This is the area between the canal river that encompasses the 6 current and former mill sites. A 2015 Slum and Blight Designation approved by the Town and the MA Department of Housing and Community Development determined the area to be blighted because 70% of the properties within the Canal District have experienced physical deterioration of buildings or improvements, abnormally low property values, chronic high vacancy rates, and known or suspected environmental contamination. Further, the public improvements throughout the area are in a general state of deterioration. Fifty-seven percent of the buildings in the study area have abnormally low property values and 41% of the buildings have been vacant for more than the last two years. In fact, 53% of the total square footage in the study area is vacant. These conditions contribute to the atmosphere of a distressed village of Turners Falls. These sites have attracted illegal dumping, vandalism, and arson.

The Montague Housing Authority’s Keith Apartment Complex houses 31 senior apartments and is less than 350 feet from the Site. The adjacent Turners Falls Paper Company with approximately 60 employees is directly adjacent to Building 11.

Cumulative Environmental Impacts: Cumulative environmental and brownfield issues have disproportionately impacted the Target Community. The existence of brownfields within Turners Falls fosters a sense of disinvestment, disregard and neglect within an already struggling community. Many of the brownfields sites within the Target Area are vacant, or underused, or in a state of disrepair but the residential and commercial areas adjacent to them among them still exist. Abandoned and derelict structures are blights to the community and debris pose threats to the health and safety of the residents who live in these neighborhoods.

The Site is a riverfront site that separates the mixed use downtown from the river. The contamination found in such proximity to the Connecticut River and to recreational facilities like the Canalside Bike Path (150 feet from Site) and public river access points (1,000 feet from Site) has a significant adverse impact on the Target Community.

*Cumulative Public Health Impacts:* There are numerous health risks associated with the friable deteriorating asbestos and other contaminants at the Building #11 Site. Contaminated hazards pose a health risk to all who enter the Site, including workers, municipal personnel, and determined trespassers as well as the sensitive populations in target area which includes minorities, elderly, and children. There are open windows on the upper floors that are causing contamination to the general area. Approximately 40% of Montague and target area residents can be classified as belonging to a sensitive population as indicated in the following table. The remediation of known contaminants at the Site is an important step toward protecting these sensitive populations from possible exposure to harmful contaminants.

Public health research indicates that poor educational outcomes are directly linked to brownfields-related conditions such as elevated lead levels and asthma. The major health risks attributed to asbestos exposure includes asbestosis, lung cancer, and mesothelioma.

In 2015, the Town conducted a competitive procurement process and awarded a development rights to rehabilitate Strathmore Building #11 (Parcel B). The proposal includes up to 20 residential units and 10,000 square feet of commercial space. It is to the developer that these hazardous materials be abated prior to closing the sale constructing mixed use and housing in the Canal District.

<b>Table 2: Percentage of Target Area and Montague Residents Belonging to a Sensitive Population</b>		
	<b>Targeted Community Census Tract 407.01</b>	<b>Town of Montague</b>
<b>Percent Minority*</b>	12.8%	10.3%
<b>Over 65 Years Old</b>	15.0%	18.0%
<b>Children (under 18)</b>	22%	20%
* data are from the 2014 ACS 5 yr estimates		

## 1.c Financial Need

*Economic Conditions:* The purpose of this funding is to enable productive re-use of the Site.

Montague is one of the most distressed Towns in Massachusetts and certainly within Franklin County (the most distressed county).

Due to the low-income population in Montague and rural location, market incentive for the private investment necessary to remediate the site is inadequate. Tax revenues are limited and providing standard services to the residents severely limits the amount of funds available for critical capital projects such as the cleanup of the Strathmore Mill. In addition, the other large

number of brownfield sites in Montague (approximately 49) has created a high demand for scarce cleanup funds.

While redevelopment of the Strathmore Mill Site is a foremost priority for the community, funds pertaining to CDBG are committed for other projects (Montague is not an entitlement community- so the community must prepare applications based on national competitiveness).

Strathmore Building #11 (Parcel B) has a committed developer that has entered into an agreement with the Town develop up to 20 market rate housing units and 10,000 square feet of commercial space. This represents a \$2.3 Million dollar investment and tax revenue to the town that is consistent with the Community's vision for the site. More importantly it is a catalyst for redevelopment of the remaining Strathmore Mill Complex (Parcel A). The proposed remediation is the first critical step to enable private investment into Building 11 and in turn, the rest of the mill complex. It is impossible to convince other stakeholders to contribute to the redevelopment and public access without first addressing contamination at the site. The town has been actively trying to redevelop the site for over 10 years and this has been repeatedly cited as one of the principal barriers to redevelopment.

The Target Community as well as the Town of Montague as a whole is largely impacted by what does or does not happen at the Site. The community has a median household income that is only 57% of the State average. The poverty rate in the Target area is a distressing 25.9%, which is because Turners Falls hosts a significant portion of the county's public assisted housing. The unemployment rate has consistently been below county and state averages since the 1980's when the mills closed.

Although the Town has leveraged \$385,000 in taxpayer funds, it is not enough to cover the entire abatement project which is estimated to cost \$702,000.

Supplemental site wide asbestos, hazardous materials and PCB audit:	\$12,000
Public project design for asbestos & hazardous materials abatement:	\$12,000
Assistance with project bidding, project award and submittal review:	\$3,000
Abatement phase project management:	\$30,000
Site wide asbestos abatement:	\$600,000
Site wide hazardous materials abatement:	\$45,000

With very limited funds, Montague is seeking support from EPA in order to realize the potential of this mixed-use development. The Town of Montague has also suffered considerable tax revenue loss with the recession and as a result of economic shock from the closure of the Hallmark Institute of Photography in Turners Falls and Yankee Nuclear Power Plant in nearby Vernon, VT. The Town alone can not absorb the cost of the clean up. In recent years the Town has also experienced severe economic disruptions that have impacted already stressed budgets which include:

- Nov 2011- Severe Winter Snow and Snowstorm Major Disaster Declaration
- Aug 2011- Hurricane Irene- Federal and State declared State of Emergency
- Oct 2011- Snowstorm- Federal and State declared State of Emergency

- Oct 2012- Hurricane Sandy- Federal and State declared State of Emergency
- Feb 2013- Severe Winter Storm, Snowstorm, and Flooding, Major Disaster Declaration
- Jan 2015- Severe Winter Storm, Snowstorm, and Flooding, Major Disaster Declaration

*Economic Effects of Brownfields:* Once an employment center in downtown, The Strathmore Mill and Building #11 has been vacant and absent from the tax roles for over 15 years. That is also true of two other mill sites in the Canal District. However, the Town sees the tax and economic revenue potential of reuse of the Site. This is supported by prioritization of this project in the Economic Development Plan, Downtown Livability Plan, Montague Community Development Strategy (Priority #1) and the Regional CEDS.

The Town's inability to invest in the Target Area and the continued contamination of highly visible properties in downtown result in a reduced tax base, lost business opportunities, depressed property values and chronic property vacancy. This continues a cycle of disinvestment. According to the 2013 Downtown Turners Falls Livability plan the highly visible blighted conditions of the canal district are a major obstacle to visitor, employee, and residential attraction and retention. Strathmore Building 11 is detrimental to the recovery of the Town as the contamination remains. Known contamination that remains will only continue to foster a sense of community disinvestment and neglect, and pose a significant hurdle to developers. Additionally, it is major liability issue for the town as the community has to deal with the ramifications of fires and consequential contamination. The community learned the hard way in 2011 when it remediated the Building #10 debris pile that it is far cheaper to abate the property before a fire destroys a building. Funds that could be used to abate, demolish, and redevelop the site are being depleted by the recurring need to board and secure the buildings and cleaning up co-mingled debris.

After years of redevelopment efforts, the Town finally has the opportunity for private investment into the Strathmore Mill Complex through the Building #11 redevelopment project, but it can only be enabled if the hazardous materials are abated.

## **2. PROJECT DESCRIPTION AND FEASIBILITY OF SUCCESS**

### **2.a Project Description**

*Existing Conditions:* The objective of the remediation is to remove a health and safety hazard and provide the Town of Montague with a site that is closer to redevelopment. Building 11 is a 7 story 32,200 square foot brick building on +/- 0.42 acres of land at 20 Canal Road. The building was constructed in 1906 for primary purpose of paper produce warehousing. The footprint of the building is 105 feet long by 48 feet wide.

The Town acquired the 270,000 square foot Strathmore Mill Complex through tax-title in 2010, after it had been non-operational for over a decade. Well in advance of acquiring the mill the Town has been proactive in planning for a downtown renaissance and specifically revitalization of the Canal District- a narrow area of land sandwiched between the Power Canal and

Connecticut River. Within a ¼ mile of the property, the town has supported investments in the Colle Opera House, Shea Theater, Great Falls Discovery Center, Canalside Rail Trail, and a reconstructed Gill-Montague Bridge. The town sponsors RiverCulture, an award winning organization that develops a series of cultural events designed to attract visitors and build the capacity of local artists and creative businesses. The Montague Economic Development Plan (2004) commits the town to increasing the town's tax base through retention, growth and recruitment of businesses in the Historic-Industrial District, one of the designated target areas identified in the plan. The recently completed 2013 Downtown Turners Falls Livability Plan, a blueprint for downtown development highlights the importance of the mill in the future of downtown.

Because of the dramatic scale of the Strathmore Complex, the Town anticipates a phased redevelopment strategy. Building 11 is considered the most development-ready segment of the Strathmore Mill Complex. It is the only standalone building. In 2012 the Town cleaned up the collapsed Building 10, which opened up critical open space on the intensely developed parcel.

The Town has gone through considerable effort to advance planning and pre-development for the development of the property. The town created flexible, mixed use "historic-industrial" zoning in 2001 to encourage flexible reuse. In 2007 the site was designated a MGL Chapter 43D Priority Development Site. The Town has conducted a thorough 21E assessment, conducted reuse studies, repairs, and remediation. Upon successful redevelopment of building 11, the Town envisions further development of the vacant Strathmore Mill Complex.

In 2016 The Town awarded Obear Construction of Montague, MA to opportunity redevelop the site into mixed use. The Town and Developer have agreed to subdivide Building 11 (Parcel B - .42 acres) from the 1.1 acre Strathmore Mill Site (Parcel A)

Most heavy machinery has been removed. The property is listed on the National Register of Historic Places, and was on the 2007 list of the ten most endangered historic resources by Preservation Massachusetts. According to a 2007 Site Feasibility Assessment by Finegold Alexander Associates, all of the nine buildings were found to be in "poor" or "fair" condition.

A January 2004 Phase II and Response Action Outcome which included soil and groundwater testing, concluded no further remediation is required at the Strathmore Mill Complex. An April 2005 Hazardous Materials Survey report by Tighe + Bond documented a significant number of materials throughout the mill buildings that were classified as asbestos containing materials. This report was updated in 2015. The report identifies the following Asbestos Containing Materials (ACMs) in Building #11:

- 640 linear feet of TSI Piping,
- 3,500 square feet of transite panels,
- 7,700 square feet of flashing cements
- window glazing for 120 windows, tar covered insulation.

As part of the survey, the following hazardous materials were catalogued:

- light fixtures (with PCB ballasts),
- hydraulic oil,
- household wastes, oils, paints, cleaners,
- bird guano,
- lead containing paints

*Proposed Cleanup Plan:* In order for the Town to redevelop Building #11, a certificate of abatement is required under Massachusetts Building Codes. Therefore the first step in the redevelopment of Strathmore Parcel B is abatement and remediation.

As outlines in the Draft Analysis of Brownfields Cleanup Alternatives (ABCA), cleanup activities will include the abatement and off-site disposal of above-ground hazardous building materials and soil contamination. The Town will implement sustainable practices throughout the cleanup.

First the Town will conduct a supplemental site wide asbestos, hazardous materials and PCB Audit, as recommended in the 2015 Hazardous Materials Inventory. The components identified in the audit will be removed / recycled or disposed of by trained personnel.

All activities will be conducted in accordance with the state's cleanup law, Chapter 21E, and cleanup regulations, the Massachusetts Contingency Plan (MCP). A private Licensed Site Professional (LSP) will be hired to develop the remedial action plan and oversee cleanup activities.

*Alignment with Revitalization Plans:* Well in advance of acquiring the mill the Town has been proactive in planning for a downtown renaissance and specifically revitalization of the Canal District- a narrow area of land sandwiched between the Power Canal and Connecticut River. Within a ¼ mile of the property, the town has supported investments in the Colle Opera House, Shea Theater, Great Falls Discovery Center, Canalside Rail Trail, and a reconstructed Gill-Montague Bridge. The town sponsors RiverCulture, an award winning organization that develops a series of cultural events designed to attract visitors and build the capacity of local artists and creative businesses. The Montague Economic Development Plan (2004) commits the town to increasing the town's tax base through retention, growth and recruitment of businesses in the Historic-Industrial District, one of the designated target areas identified in the plan. The recently completed 2013 Downtown Turners Falls Livability Plan, a blueprint for downtown development highlights the importance of the mill in the future of downtown. This plan was funded by a HUD Sustainable Communities Grant Program and thus incorporates the HUD-DOT-EPA Livability Principles.

The top sustainable economic development goal in the 2013 Franklin County Regional Plan for Sustainable Development was to redevelop vacant or underutilized industrial/commercial buildings or sites. A key recommendation from the Economic Development Chapter was to support activities that redevelop vacant or underutilized commercial and industrial properties, such as through the FRCOG Regional Brownfields Program and to target efforts to redevelop historic structures in village centers. Another recommendation in the chapter was to support activities that revitalize and more intensely use downtowns and village centers. The RPSD



identified Priority Development Sites for Economic Development that included existing employment centers, such as Turners Falls. Link: <http://frcog.org/publication/view/sustainable-franklin-county/>

## **2.b Task Description and Budget Table**

### Task Descriptions

Task # 1 – Community Involvement: Funds will be used for programmatic activities necessary to engage community members in the grant and redevelopment of the Site. Programmatic expenses include finalizing the ABCA, and finalizing and implementing the community relations plan. This is expected to include up to 10 community meetings and meetings with community organizations. *Budget \$6,000*

Task # 2 – Supplemental site wide asbestos, hazardous materials and PCB Audit: Funds will be used to hire a third party to conduct a supplemental asbestos/hazardous materials/PCB audit which will include bulk sampling in order to finalize the design of the project. *Budget \$6,000*

Task #3- Public Project Design and procurement for abatement phase: Funds will be used to hire a third party engineer to develop project design and specifications and conduct public procurement process to acquire a contractor for the abatement phase. *Budget \$15,000*

Task#4 Abatement Phase project oversight, management, and compliance: Funds will be used to hire a third party engineer to monitor the abatement phase construction activities and to prepare all necessary reports. *Budget \$30,000*

Task#5 Site Wide asbestos and hazardous materials abatement: Abate approximately 4,000 linear feet of TSI Piping, 130 cubic yards of transite components, 20,000 square feet of transite panels, 4 industrial boilers, and 1,000 square feet of floor tile, among other ACMs identified in the 2015 Hazardous Materials Inventory. Also abatement fluorescent light tubes, oil filled ballasts, stored paints, chemicals and oils and oil filled equipment, etc as identified in the 2015 hazardous materials inventory. *Budget \$183,000*

Budget Table

<b>Strathmore Building #11 (Parcel B) Budget</b>						
<b>Budget Category</b>	<b>1</b>	<b>2</b>	<b>3</b>	<b>4</b>	<b>5</b>	<b>TOTAL</b>
	Community Involvement	Supplemental Audit	Project Design/procurement	project oversight, management, compliance	Cleanup	
Personnel						<b>\$0</b>
Fringe						<b>\$0</b>
Benefits						<b>\$0</b>
travel						<b>\$0</b>
equipment						<b>\$0</b>
supplies						<b>\$0</b>
contractual	\$6,000	\$6,000	\$15,000	\$30,000	\$183,000	<b>\$240,000</b>
other						<b>\$0</b>
Total Federal funding	\$6,000	\$6,000	\$15,000	\$30,000	\$143,000	<b>\$200,000</b>
Cost Share					\$40,000	<b>\$40,000</b>
Total Budget						<b>\$240,000</b>

All contracts entered into by the applicant with third parties will be in compliance with 40 CFR31.36 and applicable state procurement laws.

**2.c Ability to Leverage**

Montague has leveraged funding for the Strathmore Mill Redevelopment, of which Parcel A cleanup and restoration is part of:

- \$40,000 cost share match from Town of Montague
- \$345,000 from Town of Montague toward site-wide abatement and remediation
- \$2,300,000 proposed private investment in Strathmore Building #11 (Parcel B) to rehabilitate the building into mixed use with 22 new residential units and 10,000 Square feet of commercial spaces
- \$352,000 from the MassWorks Infrastructure Program to construct public parking infrastructure adjacent to the Site (on a former brownfield) to support redevelopment of Strathmore and the District.
- \$47,470 toward site assessment related activities from the Franklin Regional Council of Governments Brownfield Program
- \$130,000 loan from Franklin Regional Council of Governments Brownfield Program Revolving Loan Fund for the 2011 cleanup of adjacent Strathmore Building #10 debris pile (2011).

### **3. COMMUNITY ENGAGEMENT AND PARTNERSHIPS**

#### **3.a Engaging the Community**

The Town, through its Planning Department will use its best efforts to engage all members of the community in the development of the cleanup plan; to provide regular updates on the cleanup activities; and to seek public involvement in the re-development of the Site. The Planning Department has already begun to develop a Community Relations Plan.

The Town will work with **Turners Falls RiverCulture** to raise awareness about the project through a public art project incorporating found (clean) objects in mill complex. The media will be scrap paper rolls or warehoused Legos leftover in one of the mill buildings. The art will be produced by local artists and displayed in vacant storefronts with information and contact information about the Cleanup project. This will engage residents and the general public in a unique and creative way. RiverCulture has previously done public artwork on the mills themselves to raise awareness about redevelopment efforts.

The Town will make information readily available to the public through the Montague official website and Facebook page as well as collaboration with the **Connecticut River Watershed Association** and their wide network. The Town will provide opportunities for public input and two-way communication to ensure the proposed cleanup activities are conducted in a manner that is protective of sensitive populations and nearby residents. The Town will complete the site specific Community Relations Plan prior to any cleanup planning, which will set forth in greater detail how the community can be involved in the project. Lastly the applicant will ensure that two-way communication is maintained throughout the duration of the project to communicate the progress to citizens and ensure that the communication is appropriate and effective for the targeted community. Methods of communicating with the public will be adjusted as needed to ensure that they are both appropriate and effective.

#### **3.b Partnerships with Government Agencies**

**Massachusetts Department of Environmental Protection (MassDEP):** Activities will be conducted in accordance with the state's cleanup law, Chapter 21E, and cleanup regulations, the Massachusetts Contingency Plan (MCP). A private Licensed Site Professional (LSP) will be hired to develop the remedial action plan and oversee cleanup activities. The MCP requires all persons to notify the MassDEP of a release or threat of release of oil and/or hazardous material and/or to perform one or more response actions. The DEP's Bureau of Waste Site Cleanup takes an active role in promoting brownfields redevelopment projects and offers technical assistance through single points of contact at each regional office. Site-specific information is made available through the regional office.

**US Environmental Protection Agency (EPA):** This project will be conducted through a cooperative agreement and the EPA Project Officer will be substantially involved in overseeing the work. The anticipated substantial federal involvement for this project may include:

- close monitoring of performance to verify the results;

- collaborating during performance of the scope of work;
- reviewing substantive terms of proposed contracts;
- reviewing qualifications of key personnel;
- reviewing and commenting on reports; and
- reviewing sites as meeting applicable site eligibility criteria.

**Franklin Regional Council of Governments (FRCOG).** FRCOG is the official area-wide planning agency in Franklin County with comprehensive planning responsibilities which include land use, transportation, economic development, and environmental management. FRCOG operates the Franklin County Regional Brownfields Program which has successfully managed several EPA Brownfield Assessment Grants and a current EPA Brownfields Revolving Loan Fund. FRCOG will share grant management expertise with the Town of Montague and has committed to update and manage project information on the EPA's online ACRES system.

### **3.c Partnerships with Community Organizations**

The Town will partner with the following community organizations:

***Connecticut River Watershed Council*** – The CRWC are stewards of the Connecticut River watershed from source to sea. The Strathmore Mill is one of only a handful of mill sites on the Connecticut River in Massachusetts. The Town already works with CRWC on the federal re-licensing of the Turners Falls Dam and Hydro Project. Our shared interest includes use of the river as a recreational resource, public access to the river, and habitat improvement of the river. CRWC has agreed to help publicize the project through their wide-ranging network and to engage their constituency in re-use planning efforts.

***Turners Falls RiverCulture-*** TFRC's mission is to work with a diverse group of community, political, educational, and business leaders to support the creative economy in Turners Falls and to establish an environment that attracts businesses, residents, and visitors to Turners Falls. RiverCulture serves as a forum partners to convene around shared topics and a platform to address local social issues through cultural means. The Town will work with Turners Falls RiverCulture to raise awareness about the project through a public art project incorporating found (clean) objects in mill complex. The media will be scrap paper rolls or warehoused Legos leftover in one of the mill buildings. The art will be produced by local artists and displayed in vacant Turners Falls storefronts with information and contact information about the Cleanup project. This will engage residents and the general public in a unique and creative way. RiverCulture has previously done public artwork on the mills themselves to raise awareness about cleanup efforts. Additionally, RiverCulture will publicize information about the project and community meetings. RiverCulture has a wide network of residents within Turners Falls and can reach them regularly through direct emails, a well travelled website, social media, and a downtown informational kiosk.

### **3.d Partnerships with Workforce Development Programs**

There is no local environmental job training program. The Franklin Hampshire Regional Employment Board is the local workforce development authority. They have agreed to share the

Invitation to Bid for the cleanup work within their network which focuses on local employment opportunities.

As standard proactive the Town of Montague through its procurement office promotes local hiring, to the extent allowed under Massachusetts Procurement Law. Provisions will be included in the bid documents for hiring local contractors to provide opportunities for experience in environmental cleanups. The Town will advertize the IFB in Greenfield Recorder, the local daily newspaper with a daily circulation of over 10,000. All know qualified contractors within Western MA (the region) will be sent a notice of the IFB from the Montague Planning Department.

The larger reconstruction project of Building#11 will create up to 45 temporary jobs. The developer is local (based in Montague, MA) and most of the company's workforce and (and subcontractors) are based in Franklin County.

#### **4. PROJECT BENEFITS**

##### **4.a Welfare, Environmental, and Public Health Benefits**

The cleanup and redevelopment of the Site will remove the contamination on the Site that contributes to a sense of disinvestment, disregard and neglect. The redevelopment of the Site will be evidence of the investment in the community and is expected to support the redevelopment of the Strathmore Mill Complex and spur additional economic development in the Canal District. The cleanup of the municipally owned site will reduce the threat of exposure to the Targeted Community and provide a public amenity. Additional benefits include a likely increase in the value of surrounding properties and the creation of housing end employment opportunities.

The removal of the hazardous materials will eliminate the exposure routes to residents. Once these materials are removed the overall risk that nearby residents and sensitive populations within the community will experience adverse health impacts from contaminants is reduced. The removal of PCBs will eliminate potential exposure to PCBs that could cause cancer, as well as a variety of other adverse health effects on the immune system, reproductive system, nervous system, and endocrine system.

The cleanup will result in the protection of the Montague Housing Authority Keith Apartments- a 31 unit senior housing complex that is less than 350 feet from the site and the 60+ employees of the adjacent Turners Falls Paper Company.

The removal of these contaminants from the riverfront removes a public health threat to all residents and sensitive populations in Montague, Greenfield and every community downstream. The removal of hazardous materials is important under the worst case scenario where the long vacant buildings collapse on the river bank, releasing hazardous materials into the river OR under the best case scenario where the mill is redeveloped and is an active and vital part of the community's riverfront. The Mill in its current state is a deterrent to public access and

recreational use of the river, which is a stated priority in Montague Comprehensive Plan and the Turners Falls Downtown Livability Plan.

#### **4.b Economic and Community Benefits**

The cleanup will immediately enable a \$2.3M private investment into the rehabilitation of Building #11 by a local contractor selected by the Town. The developer's proposal states that the project will create up to 20 living units and 10,000 square feet of commercial space. The project will create 45 temporary construction jobs. It is estimated that project will bring between \$15,000 and \$20,000 of annual tax revenue to the community. This property is currently a tax drain on the community.

Once rehabilitation is complete, property taxes for the condominiums will add to the town's revenue. Even more important is that the successful development of Building 11 will spur further interest and development in the remaining 9 buildings in Parcel A. The economic activity will revive the neighborhood, invigorate the local economy, provide near and long-term employment opportunities, utilize sustainability in its cleanup and redevelopment, remove human health and environmental impacts due to contamination of hazardous materials at the site.

### **5. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE**

#### **5.a Audit Findings**

The Town of Montague does not have any adverse audit findings

#### **5.b Programmatic Capability**

The Town of Montague's Planning and Conservation Department will be responsible for the administration, procurement, and reporting requirements of the grant. Walter Ramsey is the Montague Town Planner. He is accredited with American Institute of Certified Planners. He has managed about 10 state and federal grants on behalf of the Town of Montague totaling over \$4M. He is the Town's representative for the Franklin County Regional Brownfields Committee and in 2011 he successfully secured and managed implementation of an EPA Cleanup Subgrant and Loan from the Franklin County Regional Brownfield Program.

In order to acquire the necessary expertise to oversee and conduct cleanup activities, the applicant intends to contract with a LSP to complete the necessary planning and cleanup activities. The hiring of a LSP is required by the MCP. The applicant will follow 40 CFR Part 31.36 and all applicable state procurement laws in contracting with all third parties.

#### **5.c Measuring Environmental Results: Anticipated Outputs/Outcomes**

Outputs:

- A cleanup plan and scope of work that incorporates community comments, concerns, and suggestions
- Obtaining funding commitments for all funds necessary to complete the cleanup
- Cleanup by a target date of November 1, 2019.
- Submission of all required state and federal required reporting until achievement of final closeout

Outcomes:

- Completed Site Cleanup
- Site redevelopment of 0.4 acres.

**5.d Past Performances and Accomplishments**

ii Has Not Received and EPA Brownfields Grant but has Received Other Federal or Non-Federal Assistance Agreements

1. Purpose and Accomplishments

Montague has received and managed many millions of dollars from federal and state funding. Some examples from the past three years include CDBG , FEMA Pre-Disaster Mitigation, National Park Service Battlefield Planning Program, FRCOG Brownfield Program Revolving Loan Fund and Subgrant, MassWorks Infrastructure Program.

2. Compliance with Grant Requirements

All grant awards identified above closely followed the established work plan, were on time and/or completed early, adhered to all terms and conditions of the granting authority. All reports were completed accurately and submitted within prescribed deadlines. There were no issues or corrective measures required.

## **Threshold Criteria for Cleanup Grants**

### **1. Applicant Eligibility**

The applicant is the Town of Montague, a municipality in the Commonwealth of Massachusetts.

### **2. Site Ownership**

The Town of Montague is currently the sole owner of the property, which consists of Strathmore Mill Buildings 11 on approximately 0.4 acres of land. The property is one of two parcels that compromise the 1.9 acre Strathmore Mill Complex. The property was acquired by tax title foreclosure on February 19, 2010. The Deed can be found in the Franklin County Registry of Deeds Book 5494 Page 83 and the Judgment in the tax lien case is found in Book 1826 Page 16.

### **3. Basic Site Information**

- A) Name of the Site: "Strathmore Mill Building 11- Parcel B."
- B) Address :20 Canal Road Turners Falls MA 01376
- C) Current owner: Town of Montague (Town)
- D) Date acquired property: Feb 19, 2010

### **4. Status and History of Contamination at the Site**

- A) The site is contaminated with hazardous substances associated with building materials in Building 11
- B) The site is former paper mill. The building is currently vacant and blighted. The 7- story 35,280 square foot building was constructed in 1906. It is located on 0.4 acres along the Connecticut River, Historically, operations in the building mainly involved warehousing of paper product. The site is on a narrow strip of land between a former coal generation power plant and an active paper mill. The site is planned to be subdivided from the 1.9 acre Strathmore Mill Complex which is owned by the Town of Montague.
- C) A January 2004 Phase II and Response Action Outcome which included soil and groundwater testing, concluded no further remediation is required. The contamination consists of hazardous substances.
- D) An April 2005 Hazardous Materials Survey report by Tighe + Bond Engineers documented a significant number of materials throughout the mill buildings that were classified as asbestos containing materials. This report was updated in 2015 by Tighe + Bond. This identified over 640 linear feet of TSI Piping, 3,500 square feet of transite panels, 7,700 square feet of flashing cements , window glazing for 120 windows, tar covered insulation. As part of the survey, the following hazardous materials were catalogued: light fixtures (with PCB ballasts), hydraulic oil, household wastes, oils, paints, cleaners, bird guano, lead containing paints.

### **5. Brownfields Site Definition**



- A) The property is not listed or proposed for listing as a Superfund Site
- B) The property is not subject to unilateral administrative orders, court orders, administrative order on consent, or judicial consent decree issued by CERCLA
- C) The property is not subject to the jurisdiction, custody, or control of the US government

## **6. Environmental Assessment Required for Cleanup Proposals**

Numerous past studies and environmental investigations of the Strathmore Mill have been conducted by various engineers, environmental consultants, planners since 2005. The results of these efforts are documents and summarized in reports which include:

- Phase I Environmental Site Assessment - Tighe + Bond (2004).
- Phase II Environmental Site Assessment and Response Action Outcome- Tighe + Bond (2004).
- Hazardous Materials Survey (2005)- Tighe + Bond. Updated 2015 by Tighe + Bond
- Phase I Environmental Site Assessment (updated 2013)- Tighe+Bond
- Strathmore Feasibility Study (2005) Finegold Alexander + Associates Inc
- Site Development Assessment (2008) Fuss & O'Neill

## **7. Enforcement and Other Actions**

There are no enforcement or other actions on this site.

## **8. Sites requiring a Property-Specific Determination**

The property does not require a property specific determination because the owner has affirmed as such under 3.c. that the property is eligible for funding.

## **9. Property Ownership Eligibility**

(A) Property Ownership Eligibility- Hazardous Substances Sites

(1) CERCLA 107 Liability- The Town of Montague affirms that it is not liable for the contamination at the site:

- The Town has not used the site for the disposal of contaminated or hazardous materials and is seeking assistance to clean up the existing hazardous materials.
- The Town was not an owner or operator at the time of the disposal
- The Town did not arrange for treatment or disposal
- The Town did not accept hazardous substances for transport to disposal or treatment

(2) Information on Liability and Defenses/Protections

(A) Information on Property Acquisition

The Town acquired fee simple ownership in 1.9 acres which included the Strathmore Mill Complex (Parcel A) and Building #11 (Parcel B) through foreclosure of real property taxes on February 19, 2010. The previous owner was Swift River Strathmore Development, LLC.

(B) Timing and/or Contribution Toward Hazardous Substances Disposal

Hazardous Substances were present on the Property prior to acquisition by the Town of Montague. The Town in no way caused or contributed to the hazardous substances on the property. The Town was involved in a 2011 ACM cleanup of collapsed Building #10. The cleanup project was funded by an EPA Subgrant from the Franklin County Regional Brownfields Program and thus was overseen by a Qualified Environmental Professional.

(C) Pre-Purchase Inquiry

The Town conducted the following pre-purchase inquiries:

- Phase I Environmental Site Assessment (2004) by Tighe + Bond
- Phase II Environmental Site Assessment and Response Action Outcome by Tighe + Bond (2004).
- Hazardous Materials Survey (2005)- Tighe + Bond. Updated 2015 by Tighe + Bond

(D) Post-Acquisition Uses

The Site has not changed since the acquisition and remains under the ownership of the Town of Montague. The Town is in the process of cleanup and remediation of the hazardous materials as well as the installing of the necessary public infrastructure to develop the site for mixed-use. Building 11 (Parcel B), through the Town's Commercial Homesteading program has a developer committed to rehabilitate the building into residential /commercial mixed use.

(E) Continuing Obligations

The Town of Montague has boarded up Building 11 (Parcel B) in order to restrict potential access to trespassers or vagrants and direct exposures to asbestos and other chemical hazards present in the building. Security measures are in place to prevent the potential for a release or potential exposure to the public. Currently, the contamination is contained and is not expected to be released to the environment.

However, potential risk to human health, public welfare, safety and the environment exists should a release of hazardous materials (asbestos) occur as a result of a fire. This risk is very real as evidenced by the occurrence of a 2007 arson fire that resulted in co-mingled asbestos debris cleaned up by the Town in 2011. The Town confirms its commitment to comply with all land use restrictions and institutional controls, assist and cooperate with those performing cleanup including access; comply with all information requests; and provide all legally required notices.

## **10. Cleanup Authority and Oversight Structure**

### **(A) Describe how you will oversee the cleanup**

The Town will engage the assistance of a Qualified Environmental Professional (QEP) to oversee the cleanup and a certified asbestos inspector. This professional will be in place prior to the start of the cleanup and will be procured using the Commonwealth's public procurement process which is an open, competitive bidding process. Cleanup will be conducted under the direction and/or in coordination with a Massachusetts Licensed Site Professional (LSP) specializing in hazardous building material abatement, demolition, and selective deconstruction.

### **(B) Plan to acquire access to adjacent properties**

There is not access to adjacent property required. Should access be required, the Town will work with property owners to secure access.

## **11. Statutory Cost Share**

(A) The Town is providing the cost share of \$40,000 as part of \$385,000 municipal cleanup appropriation.

(B) The Town is not seeking a cost share waiver.

## **12. Community Notification**

The Town of Montague provided the community with a notice of intent to apply for the EPA brownfields grant on December 1, 2016 with the Town Clerk and published in Montague Reporter on the same day. The meeting was held on December 14, 2016. A copy of the public meeting advertisement along with comments from meeting, sign-in sheets, response to comments and meeting summary are attached to the application.

## **Attachments**

1. Transmittal Letter
  - a. Other factors checklist
  - b. Letter from MassDEP
2. Narrative
  - a. Leverage Commitment Letter
  - b. Community Organizations Letters of Commitment
3. Threshold Criteria
  - a. Threshold Criteria
  - b. Proof of Ownership
  - c. Property specific determination- NA
  - d. Petroleum eligibility determination- NA

- e. Cost share waiver- NA
- f. Draft ABCA
- g. Community Notification
  - i. Newspaper Advertisement
  - ii. Town Clerk posting Notice
  - iii. Comments and response
  - iv. Minutes of Public Meeting

DRAFT

### ***Assessment Other Factors Checklist***

Name of Applicant: ***Town of Montague***

Please identify (with an **X**) which, if any of the below items apply to your community or your project as described in your proposal. To be considered for an Other Factor, you must include the page number where each applicable factor is discussed in your proposal. EPA will verify these disclosures prior to selection and may consider this information during the selection process. If this information is not clearly discussed in your narrative proposal or in any other attachments, it will not be considered during the selection process.

<b>Other Factor</b>	<b>Page #</b>
<i>None of the Other Factors are applicable.</i>	
Community population is 10,000 or less.	<b>X (1)</b>
Applicant is, or will assist, a federally recognized Indian tribe or United States territory.	
Targeted brownfield sites are impacted by mine-scarred land	
Applicant demonstrates firm leveraging commitments for facilitating brownfield project completion by identifying amounts and contributors of funding in the proposal and have included documentation.	<b>X (10)</b>
Recent (2008 or later) significant economic disruption has occurred within community, resulting in a significant percentage loss of community jobs and tax base.	<b>X (5)</b>
Applicant is one of the 24 recipients, or a core partner/implementation strategy party, of a “manufacturing community” designation provided by the Economic Development Administration (EDA) under the Investing in Manufacturing Communities Partnership (IMCP). To be considered, <b>applicants must clearly demonstrate in the proposal the nexus between their IMCP designation and the Brownfield activities. Additionally, applicants must attach documentation</b> which demonstrate either designation as one of the 24 recipients, or relevant pages from a recipient’s IMCP proposal which lists/describes the core partners and implementation strategy parties.	
Applicant is a recipient or a core partner of HUD-DOT-EPA Partnership for Sustainable Communities (PSC) grant funding or technical assistance that is directly tied to the proposed Brownfields project, and can demonstrate that funding from a PSC grant/technical assistance has or will benefit the project area. Examples of PSC grant or technical assistance include a HUD Regional Planning or Challenge grant, DOT Transportation Investment Generating Economic Recovery (TIGER), or EPA Smart Growth Implementation or Building Blocks Assistance, etc. To be considered, applicant must attach documentation.	<b>X (9)</b>
Applicant is a recipient of an EPA Brownfields Area-Wide Planning grant	



Commonwealth of Massachusetts  
Executive Office of Energy & Environmental Affairs

## Department of Environmental Protection

One Winter Street Boston, MA 02108 • 617-292-5500

Charles D. Baker  
Governor

Karyn E. Polito  
Lieutenant Governor

Matthew A. Beaton  
Secretary

Martin Suuberg  
Commissioner

November 30, 2016

U.S. EPA New England  
Attn: Frank Gardner  
5 Post Office Square, Suite 100  
Mail Code: OSRR07-3  
Boston, MA 02109-3912

RE: STATE LETTER OF ACKNOWLEDGMENT  
*Town of Montague, Applications for EPA Cleanup Grant Funds, 20 Canal Road*

Dear Mr. Gardner:

I am writing to support the proposal submitted by the Town of Montague (the "Town") under the Fiscal Year 2017 U.S. Environmental Protection Agency (EPA) Brownfield Cleanup Grant Program. Funding from EPA will assist the City in the cleanup of two parcels (two separate grant applications) that are part of the vacant Strathmore Mill at 20 Canal Road. The property was formerly used as a mill, and was acquired by the Town in 2010. The property has since become the primary redevelopment priority for the Town. Adaptive reuse is planned and consists of living/working space and parking infrastructure. EPA funding will assist in the cleanup of the property to prepare it for redevelopment.

On January 23, 2015, Governor Baker signed his first Executive Order, creating the Community Compact Cabinet, in order to elevate the Administration's partnerships with cities and towns across the Commonwealth. Lieutenant Governor Polito chairs the cabinet, which concentrates financial, technical, and other resources at the state level to a select group of projects including Brownfields. The Town's compact was signed on December 18, 2015, ensuring any funding provided by EPA will be supported by a focused commitment of state resources.

We greatly appreciate EPA's continued support of Brownfield efforts here in Massachusetts!

Sincerely,

Rodney Elliott  
Brownfields Coordinator, Bureau of Waste Site Cleanup

cc: Walter Ramsey, Montague Town Planner  
Cynthia Pawlowski, Brownfields Coordinator, MassDEP Western Regional Office  
Caprice Shaw, MassDEP Western Regional Office  
Angela Gallagher, Assistant Brownfields Coordinator, MassDEP Southeast Regional Office